Case 2:05-cr-20030-JPM Document 128 Filed 11/21/05 Page 1 of 3 PageID 178 IN THE UNITED STATES DISTRICT COURT AFOR THE WESTERN DISTRICT OF TENNESSEE 2005 NOV 17 PM 3: 13 WESTERN DIVISION THOMAS M. GOULD UNITED STATES OF Plaintiff, Cr. No. 05-20030-M/ VS. MOTION GRANTED CHRISTOPHER BAILEY, U.S. DISTRICT JUDGE Nov. 29,2005 at 2005 Defendant. 10:00 A.M.

MOTION TO CONTINUE

Comes now the United States of America by and through its counsel, Lawrence J. Laurenzi, Acting United States Attorney for the Western District of Tennessee, and files its Motion to Continue the change of plea from the present setting of November 22, 2005. Additional time is also needed to draft an Information. The government would request a setting after the Thanksgiving holiday. Counsel for the defendant has been contacted and has no objection to this motion.

Respectfully submitted,

TERRELL L. HARRIS United States Attorney

By:

/. RAE OLIVER

Assistant United States Attorney

167 N. Main, Room 800 Memphis, TN 38103 (#18831 Tennessee)

files decrement entered on the docket sheet in compliance with files . Tor. Yor 32(b) FNOrP on 121-05



CERTIFICATE OF SERVICE

I, V. Rae Oliver, Assistant United States Attorney for the Western District of Tennessee, hereby certify that a copy of the foregoing Motion to Continue has been mailed, first class postage pre-paid, to Charles Waldman, 200 Jefferson Avenue, Suite 210, Memphis, Tennessee 38103

This 12d day of November, 2005.

V. RAE OLIVER

Assistant United States Attorney 167 N. Main, Room 800 Memphis, TN 38103



Notice of Distribution

This notice confirms a copy of the document docketed as number 128 in case 2:05-CR-20030 was distributed by fax, mail, or direct printing on November 21, 2005 to the parties listed.

Charles E. Waldman WALDMAN & ASSOCIATES 200 Jefferson Ave. Ste. 210 Memphis, TN 38103

Valeria Rae Oliver U.S. ATTORNEY'S OFFICE 167 N. Main St. Ste. 800 Memphis, TN 38103

Honorable Jon McCalla US DISTRICT COURT